

**IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF PENNSYLVANIA**

STEWART ABRAMSON and JAMES  
EVERETT SHELTON, individually and on  
behalf of a class of all persons and entities  
similarly situated,

Plaintiff

vs.

AGENTRA, LLC, ANGELIC  
MARKETING GROUP L.L.C., and  
MATTHEW JONES

Defendants.

Case No. 18-cv-615-PLD

COMPLAINT-CLASS ACTION

**PLAINTIFF’S THIRD MOTION TO COMPEL  
AGENTRA, LLC TO PROVIDE DISCOVERY RESPONSES**

Agentra, LLC (“Agentra”) provides insurance services to consumers. To do so, it relies on telemarketing using its agents and their third-party vendors. Plaintiff alleges that Agentra, through one of their agent and vendors, contacted him and a putative class of individuals he seeks to represent using a pre-recorded message on behalf of Agentra in violation of the Telephone Consumer Protection Act, 47 U.S.C. § 227, (“TCPA”). In fact, as outlined in the Plaintiff’s Motion to Amend his Complaint, Agentra has continued, through its agents, to engage the services of vendors sending pre-recorded telemarketing calls despite the pendency of this lawsuit. *See* ECF No. 50 and 50-1.

As outlined in a prior motion, the parties conducted their Fed. R. Civ. P. 26(f) conference on January 8, 2019. On April 29, 2019, Agentra responded to the Plaintiff’s second set of discovery, which included:

**Request No. 4:** Documents that identify all leads or potential customers that came from Angelic or Matthew Jones to Agentra agents over the course of the putative class period.

**Response:** Defendant will produce non-privileged documents responsive to this request.

**Request No. 5:** Documents that identify all sales or customers that came from Agentra agents that were first called by Angelic or Matthew Jones over the course of the putative class period. If you are unable to provide that information, provide all sales or customers that came from Agentra agents who hired Angelic or Matthew Jones over the course of the putative class period.

**Response:** Defendant will produce non-privileged documents responsive to this request.

Unfortunately, Agentra has not completed its production. Specifically, the Plaintiff seeks production of all individuals that Agentra knows the co-defendants Matthew Jones and Angelic Marketing Group L.L.C. generated through Agentra, which is alleged to be through illegal telemarketing. The Plaintiff attempted to confer with Agentra via telephone and e-mail regarding this issue on July 5, 9 and 10, 2019, but has not received the supplement or a response. In compliance with LCvR 37.2, the discovery requests and responses are attached as Exhibit 1.

## CONCLUSION

For the foregoing reasons, Plaintiff respectfully request his motion to compel be granted and Agentra be ordered to provide all responsive documents within 7 days. A proposed Order is attached as Exhibit 2.

Plaintiff by his attorneys,

/s/ Anthony I. Paronich

Anthony I. Paronich

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Dated: July 15, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that on July 15, 2019, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties by operation of the court's electronic filing system.

/s/ Anthony I. Paronich  
Anthony I. Paronich